

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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JUN 30 2006

Federal Communications Commission  
Office of Secretary

*In the Matter of*

Request by Hennepin County, Minnesota )  
For a Temporary Waiver of )  
Part 90 Rules to Allow Establishment ) DA 06-1182  
Of a Region-Wide 700 MHz Wideband )  
Public Safety Data Communications System )

**COMMENTS OF THE NATIONAL PUBLIC SAFETY TELCOMMUNICATIONS  
COUNCIL**

The National Public Safety Telecommunications Council (NPSTC) submits these Comments in response to the Commission's *Public Notice*<sup>1</sup> requesting Comment on the waiver request of Hennepin County, Minnesota to implement a 700 MHz wideband data public safety system. NPSTC supports Hennepin County's request as it demonstrates that local public safety agencies can determine how best to use the wideband/broadband segments of the 700 MHz band. NPSTC takes no position regarding any issue involving the technical/operational parameters of the waiver and application.

**The National Public Safety Telecommunications Council**

NPSTC serves both as a resource and advocate for public safety organizations in the United States on matters relating to public safety telecommunications. NPSTC is a federation of public safety organizations dedicated to encouraging and facilitating, through its collective voice, the implementation of the Public Safety Wireless Advisory Committee (PSWAC) and the 700 MHz Public Safety National Coordination Committee

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<sup>1</sup> *Public Notice*, Wireless Telecommunications Bureau seeks Comment on Request by Hennepin County, Minnesota, for Temporary Waiver of Part 90 Rules to Allow Establishment of a Region-Wide 700 MHz wideband Public Safety Data Communications System, DA 06-1182 (June 1, 2006)

(NCC) recommendations. NPSTC explores technologies and public policy involving public safety agencies, analyzes the ramifications of particular issues, and submits comments to governmental bodies with the objective of furthering public safety communications worldwide. NPSTC serves as a standing forum for the exchange of ideas and information for effective public safety telecommunications. The following 13 organizations participate in NPSTC:

American Association of State Highway and Transportation Officials

American Radio Relay League

American Red Cross

Association of Public-Safety Communications Officials-International

Forestry Conservation Communications Association

International Association of Chiefs of Police

International Association of Emergency Managers

International Association of Fire Chiefs

International Association of Fish and Wildlife Agencies

International Municipal Signal Association

National Association of State Emergency Medical Services Officials

National Association of State Telecommunications Directors

National Association of State Foresters

Several federal agencies are liaison members of NPSTC. These include the Department of Agriculture, Department of Homeland Security (SAFECOM Program and the Federal Emergency Management Agency), Department of Commerce (National

Telecommunications and Information Administration), Department of the Interior, and the Department of Justice (National Institute of Justice, CommTech Program).

## **Background**

The waiver request is submitted on behalf of Hennepin County, Minnesota, Washington County, Minnesota and the Metropolitan Emergency Service Board of St. Paul, Minnesota (hereafter referred to as "Hennepin County"). These agencies are within 700 MHz Regional Planning Committee 22. These agencies seek use of twenty-eight 700 MHz public safety wideband general use and wideband interoperability channels. The waiver requests seventeen wideband general use channels (31, 32, 34, 35, 43, 44, 50, 52, 54, 58, 60, 64, 66, 70, 71, 79, 88) and eleven wideband interoperability channels (28, 29, 30, 37, 38, 39, 46, 48, 73, 75, 83). These spectrum resources will be used to establish a region-wide 700 MHz wideband wireless data communications system that will achieve interoperability among first responders and provide capacity for day-to-day use.

Hennepin County relates that limiting the proposed system to the current wideband general use channels will reduce capacity, sacrifice basic services, limit the number of concurrent users and reduce geographic coverage. Hennepin County acknowledges the Commission's proceeding addressing the wideband/broadband structure in the 700 MHz band.<sup>2</sup> Hennepin County states that it will accept a conditional waiver; the system would be rechannelized to conform with any future revisions to Commission rules and the Region 22 wideband allocations.

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<sup>2</sup> In the Matter of the Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010, *Eighth Notice of Proposed Rulemaking*, WT Docket 96-86, FCC 06-34 (March 21, 2006).

## **Hennepin County's Request Will Provide Significant Benefits to the Region's Public Safety Agencies**

Hennepin County's request falls within the model proposed by NPSTC in the Commission's 700 MHz proceeding addressing the wideband and broadband structure.<sup>3</sup> NPSTC's proposes that the current reserve, general use, and interoperability wideband channels be combined to provide wideband and/or broadband applications, the parameters of which will be determined by local agencies in coordination with the regional planning committees. An underlying premise of the NPSTC model is that local and state agencies, in conjunction with the Regional Planning Committee, are in the best position to structure the 700 MHz wideband and broadband segments to meet the requirements of local public safety operations. Hennepin County's request reflects how this model will work effectively. NPSTC takes no position regarding the technical/operational parameters of the waiver request and those interests that may be affected.

Through the diligent work of Hennepin County and the other participating agencies, the requirements of the region's numerous agencies were evaluated and detailed. Significantly, the need to integrate connectivity with multiple E-9-1-1 Public Safety Answering Points, Computer Aided Dispatch and Records Management System networks was included in the requirements. An examination of wideband and broadband technology applications was made and included an analysis of the costs of each. Decisions addressing whether capacity should be devoted to wideband or broadband operations were made. A comprehensive plan addressing how the channels would be

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<sup>3</sup> NPSTC Comments, dated June 5, 2006 are set forth in WT Docket 96-86 and respond to the Commission's Eighth Notice of Proposed Rulemaking.

used was forged. Importantly, the request reflects how all the elements in the plan, including whether channels would be dedicated to wideband technology, must comport with available funding. The proposal has been endorsed by Regional Planning Committee 22 and fits within the region's plan submitted to the Commission.

Hennepin County's waiver request symbolizes that standard by which NPSTC believes the 700 MHz wideband/broadband channels should be administered. Local public safety agencies have had a meaningful opportunity to structure the 700 MHz band in a manner that responds to local needs. The system proposed will make a tangible contribution to improving public safety communications throughout the region and indicates the crucial importance of the 700 MHz band to public safety operations. For these reasons, NPSTC endorses Hennepin County's waiver request.

Respectfully submitted,

*Vincent R. Stile*

Vincent R. Stile, Chair  
NATIONAL PUBLIC SAFETY  
TELECOMMUNICATIONS COUNCIL  
8191 Southpark Lane, Number 205  
Littleton, Colorado 80120-4641  
303.866-807

June 30, 2005

Certification

In addition to filing the necessary copies with the Commission's Secretary at the offsite facility, a copy of the attached Comments of the National Public Safety Telecommunications Council was to sent first class mail to:

John Evanoff, Esquire  
Wireless Telecommunications Bureau  
Public Safety and Private Infrastructure Division  
Federal Communications Commission  
Washington, D.C. 20554

*John E. Evanoff*

*6.30.06*